

SUPERIOR COURT OF N.J.

REC'D

JAN 13 2003

DONALD E. PHELAN
CLERK

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ471-02-1(10)

Superior Court

Docket Number 03 - 01 - 00016-S

STATE OF NEW JERSEY)

INDICTMENT

v.)

SUHEIL ANDUJAR)

FELIX RUIZ)

JACQUELINE LAMBOY)

DIMARIE RAMIREZ)

and)

MELVIN RIVERA)

The Grand Jurors of and for the State of New Jersey, upon
their oaths, present that:

COUNT ONE

(Conspiracy - Third Degree)

SUHEIL ANDUJAR

FELIX RUIZ

JACQUELINE LAMBOY

DIMARIE RAMIREZ

and

MELVIN RIVERA

who are named as defendants herein, and Iris Salkauski, who is a
conspirator but who is not named as a defendant herein, and
another whose identity is known to the Grand Jurors but who is not

named as a defendant herein, between on or about April 15, 1998, and on or about February 19, 1999, at the City of Camden, at the Townships of Cherry Hill and Pennsauken, all in the County of Camden, at the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the crime of theft by deception, did agree that:

- A. One or more of them would engage in conduct which would constitute the aforesaid crime or an attempt or solicitation to commit such crime; or
- B. One or more of them would aid in the planning, attempt, solicitation or commission of said crime, that is:
 - 1. Purposely obtain the property of another in excess of \$500 by deception, in violation of N.J.S.A. 2C:20-4.

The Grand Jurors aforesaid, upon their oaths, do further present that in pursuance of the said conspiracy, the following Overt Acts, among others, were committed:

OVERT ACTS

- 1. On or about April 15, 1998, at the City of Camden, in the County of Camden, the said SUHEIL ANDUJAR was the driver of a vehicle involved in a staged collision.
- 2. On or about April 15, 1998, at the City of Camden, in the County of Camden, the said MELVIN RIVERA was the driver of a vehicle involved in a staged collision.

3. On or about April 15, 1998, at the City of Camden, in the County of Camden, the said FELIX RUIZ was an occupant in a vehicle involved in a staged collision.
4. On or about April 15, 1998, at the City of Camden, in the County of Camden, the said JACQUELINE LAMBOY was an occupant in a vehicle involved in a staged collision.
5. On or about April 15, 1998, at the City of Camden, in the County of Camden, the said DIMARIE RAMIREZ was an occupant in a vehicle involved in a staged collision.

All contrary to the provisions of N.J.S.A 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Attempted Theft by Deception - Third Degree)

FELIX RUIZ

JACQUELINE LAMBOY

and

DIMARIE RAMIREZ

between on or about April 16, 1998, and on or about February 19, 1999, at the City of Camden, at the Townships of Cherry Hill and Pennsauken, all in the County of Camden, at the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, did purposely obtain or attempt to obtain property of another in excess of \$500 by deception, that is, the said FELIX RUIZ, JACQUELINE LAMBOY and DIMARIE RAMIREZ did purposely attempt to obtain the property of Allstate Insurance Company in excess of \$500 by creating or reinforcing the false impression that an automobile collision that occurred in the City of Camden on April 15, 1998 was accidental; and that Personal Injury Protection (PIP) insurance claims and insurance claims for non-economic losses were compensable pursuant to automobile insurance policies in connection with the planned and staged automobile collision;

WHEREAS, IN TRUTH AND IN FACT, as the said FELIX RUIZ, JACQUELINE LAMBOY and DIMARIE RAMIREZ well knew, the automobile collision which occurred in the City of Camden on April 15, 1998, was not accidental, but was planned and staged, and the Personal

Injury Protection (PIP) insurance claims and insurance claims for non-economic losses submitted to Allstate Insurance Company were not compensable in connection with the planned and staged automobile collision, contrary to the provisions of N.J.S.A. 2C:5-1, N.J.S.A. 2C:20-4 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

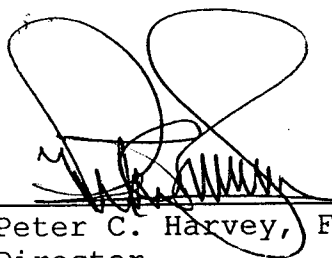
(Theft by Deception - Third Degree)

SUHEIL ANDUJAR

between on or about April 16, 1998, and on or about February 19, 1999, at the City of Camden, at the Townships of Cherry Hill and Pennsauken, all in the County of Camden, at the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, did purposely obtain or attempt to obtain property of another in excess of \$500 by deception, that is, the said SUHEIL ANDUJAR did purposely obtain or attempt to obtain the property from Allstate Insurance Company in excess of \$500 by creating or reinforcing the false impression that an automobile collision that occurred in the City of Camden on April 15, 1998 was accidental; and that Personal Injury Protection (PIP) insurance claims and insurance claims for non-economic losses were compensable pursuant to automobile insurance policies in connection with the planned and staged automobile collision;

WHEREAS, IN TRUTH AND IN FACT, as the said SUHEIL ANDUJAR well knew, the automobile collision which occurred in the City of Camden on April 15, 1998, was not accidental, but was planned and staged, and the Personal Injury Protection (PIP) insurance claims and insurance claims for non-economic losses submitted to Allstate Insurance Company were not compensable in connection with the planned and staged automobile collision, contrary to the

provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:5-1 and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.



Peter C. Harvey, F.A.A.G.
Director
Division of Criminal Justice

A TRUE BILL:



Kimberly M. O'Neil, Foreperson

Date: 1/13/03